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Citizens Telecommunications Company of Illinois and Grafton Technologies, Inc.)	3-0014
)	Docket No. 92-
Joint Petition for Approval of Negotiated)	
Second Amendment to Interconnection)	
Agreement pursuant to 47 U.S.C. § 252.)	
)	

JOINT PETITION FOR APPROVAL OF NEGOTIATED SECOND AMENDMENT TO AGREEMENT BETWEEN

CITIZENS TELECOMMUNICATIONS COMPANY OF ILLINOIS AND GRAFTON TECHNOLOGIES, INC.

Citizens Telecommunications Company of Illinois ("Citizens") and Grafton Technologies, Inc. ("Grafton") hereby request that the Illinois Commerce Commission (the "Commission") review and approve the attached Second Amendment to Agreement Between Citizens Communications Company of Illinois and Grafton Technologies, Inc. (the "Second Amendment"), pursuant to Sections 252(a)(1) and 252(e) of the Telecommunications Act of 1996, 47 U.S.C. § 252(a)(1) through 252(e) (the "Act"). In support thereof, the parties state as follows:

- 1. On January 25, 2001, in docket 01-0771, the Illinois Commerce Commission issued an Order approving a Negotiated Interconnection Agreement between Citizens and Grafton.
- 2. On May 22, 2002, in docket 02-0214, the Illinois Commerce Commission issued an Order approving a Negotiated Amendment to Interconnection Agreement between Citizens and Grafton.

- 3. The Second Amendment to that Negotiated Interconnection Agreement attached hereto was arrived at through good faith negotiations between the parties as contemplated by § 252(a) of the Act.
- 4. Pursuant to § 252(e)(2) of the Act, the Commission may only reject a negotiated agreement or amendment if it finds that (1) the Agreement discriminates against another carrier, or (2) implementation of the Agreement would not be consistent with the public interest, convenience, and necessity. Neither basis for rejection is present here.
- 5. As set forth in the attached Statement in Support, the implementation of the Second Amendment is consistent with the public interest and Citizens will make the Second Amendment available to any other telecommunications carrier operating within its territory. Other carriers are also free to negotiate their own terms and conditions pursuant to the applicable provisions of the Act. For this reason, the Second Amendment is not discriminatory.
- 6. In accordance with § 252(e)(4) of the Act, the Second Amendment will be deemed approved if the Commission does not act to approve or reject the Second Amendment within 90 days from the date of this submission.
- 7. Copies of the Second Amendment are available for public inspection in Citizens' and Grafton's public offices.

WHEREFORE, Citizens Telecommunications Company of Illinois and Grafton Technologies, Inc. respectfully request that the Commission approve the attached Second Amendment to Local Interconnection Agreement under § 252(e) of the Act as expeditiously as possible.

Respectfully submitted,

CITIZENS TELECOMMUNICATIONS

COMPANY OF ILLINOIS

By: hu Swille

GRAFTON TECHNOLOGIES, INC.

By:

VERIFICATION

I, David Ruhland do on oath depose and state that I am a Regulatory Manager for Citizens Telecommunications Company of Illinois, that I have read the foregoing Statement in Support of Joint Petition for Approval of Negotiated Second Amendment to Interconnection Agreement and the Joint Petition for Approval of Negotiated Second Amendment to Interconnection Agreement and that I know the contents thereof, and that the same is true and correct to the best of my knowledge, information and belief.

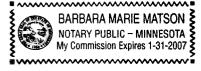
David Ruhland

Daved Ruhland

SIGNED AND SWORN TO BEFORE ME THIS

DAYO

NOTARY PUBLIC



VERIFICATION

I, MIKE ARNOLD do on oath depose and state that I am the VICE PRESIDENT and GENERAL MANAGER for GRAFTON TECHNOLOGIES, INC., that I have read the foregoing Petition and that I know the contents thereof, an that the same is true and correct to the best of my knowledge, information and belief.

MIKE ARNOLD

SIGNED AND SWORN TO BEFORE ME THIS ________ DAY OF

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